

Exhibit A

Strickland v. United States, No. 20-cv-66

Plaintiff's Privilege Log

	Date Range	Doc. Type	Sender(s)/Recipient(s)	Category Description	Privilege Justification	Docs. Withheld/Redactions
1	August 2017 – March 2019	Emails (<i>e.g.</i> , EDR complaint exhibits), PDF attachments, handwritten notes produced during EDR complaint process	Various	Redaction of FDO client identifying information, FDO internal case related information, and information protected by FDO WP and AC privileges. ¹	AC privilege WP privilege	Numerous redactions in documents provided in discovery ²
2	September 2018 – March 2019	Emails, handwritten notes produced during EDR complaint process	Cooper Strickland/Caryn Strickland	Communications regarding EDR process while Cooper Strickland was serving as Caryn Strickland's EDR representative	AC privilege WP privilege Spousal privilege	Redactions provided in emails disclosed in discovery
3	October 5, 2018	Audio Recording	Heather Beam/Caryn Strickland	FDO client identifying information	AC privilege WP privilege	Audio silenced to redact privileged info

¹ Because the redactions of FDO related information concern many different clients, proceedings, and case assignments, a categorical description of the basis for redaction is provided throughout this document. Counsel are available to meet and confer regarding any specific questions pertaining to the redactions.

² The nature of these redactions should be self-evident from the face of the documents. Counsel are available to meet and confer regarding any specific questions pertaining to the redactions.

4	August 9, 2018	Audio Recording	Josh Carpenter/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
5	August 24, 2018	Audio Recording	Josh Carpenter/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
6	November 16, 2018	Audio Recording	FDO Team Meeting: Peter Adolf, Cecilia Oseguera, Lisa Ottens, Ivette Arroyo-Becker	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
7	December 21, 2018	Audio Recording	FDO All-Staff Meeting: Relevant speakers are Peter Adolf, Kevin Tate, and Tony Martinez	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
8	November 6, 2018	Audio Recording	Josh Carpenter/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
9	January 11, 2019	Audio Recording	Josh Carpenter/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info

10	August 3, 2018	Audio Recording	Josh Carpenter/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
11	September 10, 2018	Audio Recording	Kelly Johnson/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
12	August 28, 2018	Audio Recording	Jared Martin/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
13	August 22, 2018	Audio Recording	Kelly Johnson/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
14	September 21, 2018	Audio Recording	Josh Carpenter/Jared Martin/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
15	October 1, 2018	Audio Recording	Josh Carpenter/Caryn Strickland	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info

16	March 15, 2019	Audio Recording ³	FDO All-Staff Meeting: Relevant Speaker is Tony Martinez	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Audio silenced to redact privileged info
17	6/1/18-8/31/18	Text Messages	Brian Wise	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
18	6/1/18-8/1/18	Text Messages	Brian Wise and Terra Parrish	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
19	5/11/18-6/20/19	Text Messages	Caleb Newman	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases ⁴	AC privilege WP privilege	Redactions in text messages disclosed in discovery

³ Plaintiff withheld approximately 22 recordings that have no relevance to this litigation and that are protected by WP and AC privileges.

⁴ In addition to redacting privileged information, Plaintiff redacted personal information relating to this individual, such as information pertaining to the individual's employment, family, and health conditions, that has no relevance to this litigation. For the sake of completeness, Plaintiff provided entire chains of text messages with irrelevant information redacted wherever feasible, rather than extracting particular text messages.

20	3/23/19-12/3/19	Text Messages	Charlie Hogle	Redaction of internal case-related/chambers information	Judicial confidentiality	Redactions in text messages disclosed in discovery
21	3/21/18-6/17/18	Text Messages	Jeff King	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
22	3/18/19-2/13/20	Text Messages	Shampa Panda	Redaction of internal case-related/chambers information ⁵	Judicial confidentiality	Redactions in text messages disclosed in discovery
23	7/19/18-3/17/19	Text Messages	Jared Martin	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
24	7/27/18-2/1/19	Text Messages	Josh Carpenter	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
25	2/27/18-6/19/18	Text Messages	JP Davis	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery

⁵ In addition to redacting privileged information, Plaintiff redacted personal information relating to this individual, such as information pertaining to the individual's employment, family, and health conditions, that has no relevance to this litigation. For the sake of completeness, Plaintiff provided entire chains of text messages with irrelevant information redacted wherever feasible, rather than extracting particular text messages.

26	3/13/18-11/8/18	Text Messages	Kelly Johnson	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
27	3/30/18-6/15/18	Text Messages	Peter Adolf	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
28	2/25/18-1/4/19	Text Messages	Terra Parrish	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases ⁶	AC privilege WP privilege	Redactions in text messages disclosed in discovery
29	6/19/18	Text Messages	JP Davis, unidentified number	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
30	3/12/18-9/7/18	Text Messages	Tony Martinez	Redaction of client identifying information	AC privilege WP privilege	Redactions in text messages disclosed in discovery

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31	3/27/18-4/19/18	Text Messages	JP Davis, Terra Parrish	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
32	3/10/18-3/27/18	Text Messages	JP Davis, Terra Parrish	Redaction of client identifying info, FDO work product information and internal discussion of FDO cases	AC privilege WP privilege	Redactions in text messages disclosed in discovery
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

⁷ This entry is **CONFIDENTIAL** pursuant to the parties' protective order, ECF No. 183.

⁹ See Fourth Circuit EDR Plan Ch. X, § 4 (2013) (protecting employee's right to confidentiality and stating that "information about allegations filed under this Plan shall be shared on a need-to-know basis"); Fourth Circuit EDR Plan § V(B)(1) (2020) ("All individuals involved in the processes under this Plan must protect the confidentiality of the allegations of wrongful conduct.").

[illegible]

⁸ See Fourth Circuit EDR Plan Ch. X, § 5(b) (2013) (“Each individual invoking the dispute resolution procedures of this Plan has the right to be represented by a person of his or her choice”); Fourth Circuit EDR Plan § V(B)(3) (2020) (stating that employee has “the right to be represented by an attorney or other person of their choice”).

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¹⁵ See Fourth Circuit EDR Plan Ch. X, § 4 (protecting employee’s right to confidentiality and stating that “information about allegations filed under this Plan shall be shared on a need-to-know basis”); Fourth Circuit EDR Plan § V(B)(1) (2020) (“All individuals involved in the processes under this Plan must protect the confidentiality of the allegations of wrongful conduct.”).